dissolution proceeding. No other subpoenaed witness has filed a declaration. Notably, Adam is not seeking to depose Ms. Shanks. Both Adam and Ms. Shanks have been notified that I have withdrawn her name as a trial witness because there is a final order in effect for the next year as to the children's residential schedule and domestic violence. **Not a single lay witness to be deposed could provide useful evidence at trial.** My primary witness list identifying any of these individuals was submitted in late July, prior to the court's entry of the permanent DVPO on August 31. Adam was notified as soon as witnesses started being served that the named individuals were ~~withdrawn from~~ my side. Adam has made no offer of proof as to how any witness has information relevant for a trial issue. Adam has already caused a needless increase in cost by scheduling multiple depositions without contacting my attorney.

4. **Financial allegations are not relevant to the pending depositions**. Adam's declaration rants about financial issues that, as things currently stand, cannot be addressed at trial. He falsely states that the order restrains him from conducting any business. Even if everything he said were true, the depositions would not be appropriate. The DVPO limits Adam's ability to "discuss any issues arising out of or related to this case with any congregant...or the Early Childhood Center. Congregants on the witness List may be questioned regarding the scope of their testimony." None of the remaining witnesses have any financial knowledge and Adam's witness list doesn't identify the scope of their testimony as financial.

5. **Factual basis for limitation of Wife's deposition**. The issues for trial are presently very narrow and no extended deposition should be necessary. I have always been extremely cooperative with the discovery process and a long deposition is not necessary. For

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